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REMARKS

Applicants express their gratitude for the telephone interview with Examiners Sujoy Kundu and Michael Nghiem, and the undersigned agent on April 13, 2006. The time and consideration of the Examiners is greatly appreciated.

The substance of the interviews is hereby made of record as directed by MPEP § 713.04. No exhibits were shown nor any demonstrations presented. Applicants explained the differences of the claimed invention and the prior art of record. The Applicants have amended the claims to include that the claimed invention is an open system that does not use the same clock for each test module and Applicants have also amended the claims to clarify the use of the test module being used in a plug and play manner for distinguishing from the prior arts of record according to suggestions by Examiner Nghiem. Agreement was not reached.

Claims 1-24 are pending to the present application. By virtue of this response, no claims have been amended or added. Accordingly, claims 1-24 are currently under consideration.

Response to Examiner's Response Mailed on April 25, 2006

Applicants respectfully submit that the Examiner has not responded to Applicants' argument that the claims of the present application includes a tester system having the structure of System Controller-Site Controller(s)-Test Module(s)-Device-Under-Test(s) (DUTs), which is distinguished from the structure of the test system disclosed by the Arkin reference. Applicants believe that it is essential to address this distinction before one can appreciate the claim limitation that "wherein the associated site controller controls at least one test module interactively with the associated site controller in a plug-and-play manner". The claim limitation describes the test module is controlled in a plug-and-play manner by the site controller, which is different from the teachings of the Arkin reference that the DUT may be attached or detached as cited by Examiner. It is because the test module is different from the DUT. This distinction is further explained in the following section.

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Claim Rejection under 35 U.S.C. § 102(a)

Claims 1-5 stand rejected under 35 U.S.C. 102(a) as allegedly being anticipated by Arkin et al. (6,028,439).

In response, Applicants respectfully submit that the Arkin reference does not teach or disclose the claim element "wherein the associated site controller controls at least one test module interactively with the associated site controller in a plug-and-play manner." In this Office Action, the Examiner expanded the cite of the Arkin reference to include column 5 line 59 to column 6 line 12 that allegedly discloses this claim limitation. Upon a close review of this paragraph, it merely describes the interaction between the test module and the DUT. It is the DUT of the Arkin reference that may be removed from the test module, which is different from the test module that can be removed from the site controller as disclosed in the present application.

This point is further illustrated in Figure 1 and Figure 2 of the Arkin reference. Even if the microcontroller (Fig. 2, 30) were considered to be the site controller, since it is physically attached in the same circuit board with the test module (Fig. 1, 14), it is impossible for the test module to be detached and/or attached from the microcontroller interactively in a plug-and-play manner. Because without the Microcontroller 30, the rest of the circuit components of Figure 2 would not work at all. In other words, there is no teaching in Arkins that the circuit components of Figure 2 may be detached from the Microcontroller 30. This is consistent with Applicants previously presented arguments that the site controller and the test module are different entities, and the Arkin reference does not teach or disclose the above claim limitation.

In addition, Applicants submit that the Arkin reference describes a closed tester architecture where vendor-specific operating system and software are used in controlling the tester system. For example, the closed tester architecture uses dedicated hardware and software, such as a common master clock (MCLK, see Arkin, Fig. 1, 15), to test a particular device-under-test (DUT). On the other hand, the present invention describes an open architecture tester system, where hardware and software framework of the tester system that include standard interfaces are described that allow the site controller to interact with test modules from different vendors in a plug-and-play

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manner. In light of the open architecture tester system, Applicants also submit that the Arkin reference does not teach or disclose the system controller of the present invention.

In particular, Applicants submit that Arkin discloses a tester system having the structure of **Host-Test Module (s)-DUT(s)**, which is shown in Figure 1 of the Arkin reference. However, the present invention discloses a tester system having the structure of **System Controller-Site Controller(s)-Test Module(s)-DUT(s)**, which is shown in Figure 2 of the present application. The microcontroller (see Arkin, Fig.2, 30) within each test module (see Arkin, Fig. 1, 14) is part of the test module, which is not the site controller of the present invention. Because the site controller is not found in the Arkin reference, the Arkin reference does not teach or disclose at least some of the features of the site controller of the present invention, such as the ability to control the test module interactively in a plug-and-play manner, to run on a different local operating system, to be coupled to multiple test modules, and to have different hardware implementations, as described in the previously presented Office Action responses.

Claim Rejection under 35 U.S.C. § 103(a)

Claims 6-8, 24 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Arkin (6,028,439) as in view of Adler (US 2002/0183955 A1). Claims 9-14 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Arkin and Adler as applied to claims 6-8 above, and further in view of Hejlsberg et al. (US 2003/0167277 A1). Claim 20 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Arkin, Adler, and Hejlsberg as applied to claims 9-14 and 19 above, and further in view of Shah (6,782,336).

In response, for at least the reasons presented above, since the Arkin reference does not disclose each and every element of the independent claim 1, its dependent claims 2-24 can not be found obvious over Arkin et al. in view of cited references to Adler, Hejlsberg, and Shah.

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CONCLUSION

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 03-1952** referencing docket no. **333772000900**. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

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Respectfully submitted,

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